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Plans are in process for cleanup of the Solar Evaporation Ponds (SEP's) at the Rocky Flats Plant (RFP). Current activities underway include a SEP sludge cleanout project discussed during a March 17, 1992, meeting at the offices of the Colorado Department of Health (CDH). This meeting was attended by you, other representatives of the Colorado Department of Health (CDH), the U. S. Department of Energy (DOE) and EG&G Rocky Flats, Inc. During this meeting you stated any SEP cleanout activity to be accomplished before the November 8, 1992, interim status expiration deadline should be submitted for CDH approval as a request for change to interim status. Also, subsequent discussions with representatives of CDH on May 20, 1992, indicated interim status could continue past November 8, 1992, should the cleanout start before (but be completed after) this date. Since the SEP cleanout is currently planned to begin before November 8, 1992, this letter requests CDH approve a change to interim status for the SEP cleanout project described herein for the duration of the SEP cleanout.

This request is pursuant to 6 CCR 1007-3, Part 100.20, which allows, upon approval of CDH, changes to interim status treatment processes and capacities provided adequate justification for the changes and a revised Part A are provided. This request seeks a change to both the capabilities and capacity of existing interim status Unit 48, Pondcrete Solidification Process: Building 788. A revised Part A application for this change to interim status and justification for the requested change are provided with this letter.

Unit 48 is the only treatment facility currently designated for SEP cleanout. The unit began operations in the mid-1980's for the purpose of solidifying SEP sludge as "pondcrete," a low-level mixed waste shipped to the DOE's Nevada Test Site (NTS) for disposal. Unfortunately, a portion of existing pondcrete at RFP was found to be unacceptable for disposal because of incomplete solidification. Treatment operations were subsequently ended in May, 1988, to evaluate improved pondcrete formulas, process equipment and quality control methods with respect to waste disposal criteria. Solidified pondcrete continued disposal until May, 1990, when shipments ended as a result of Land Disposal Restrictions (LDR's) at NTS. Pondcrete will continue temporary storage at RFP until NTS achieves compliance with LDR's. The enhanced capabilities now planned for the unit include advanced process control technology and new process equipment which are designed to provide reliability in solidifying the remaining SEP sludge as well as increasing process capacity for more rapid cleanout.

The current status of the SEP's contents includes various quantities of water and sludge in 207A Pond, 207B-Series Ponds, 207C Pond and the clarifier tank near Building 788. A detailed breakdown of quantities is provided in Enclosure A.

This request for a change to interim status is consistent with SEP cleanout information provided at the March 17, 1992, meeting. The SEP cleanout will be accomplished with two separate systems addressing the 207A/207B-Series Ponds and the 207C Pond/clarifier tank. The 207A/207B-Series Ponds contents will be consolidated in the B-Series Ponds for evaporation, disinfection and solidification. The cleanout strategy and consolidation/disinfection process have been documented in a DOE letter (J. K. Hartman letter to F. Dowsett and G. Baughman, 92-DOE-7009, Regulatory Approval for Solar Pond Cleanout Strategy, dated June 22, 1992) while the evaporation process has been documented in the Solar Ponds IM/IRA as approved by CDH in a letter dated May 30, 1992. The 207A/207B-Series Ponds contents will be solidified in a new chemical stabilization and solidification (CSS) process located in the area adjacent to the south edge of 207A Pond and on the 750 Pad south of the SEP area. The 207C Pond/clarifier tank contents will also be handled in a new CSS process in the area adjacent to the south edge of 207C Pond and on the 750 Pad south of the SEP area. A more detailed description of the entire SEP cleanout is provided in Enclosure A.

The SEP cleanout project will have a maximum solidified waste production rate of approximately 35 tons per hour (versus 13 tons per hour current interim status rate for Unit 48). The total quantity of waste produced by the cleanout is expected to be on the order of 7,000 tons. Following the cleanout, final remediation of the SEP area will be performed under the Interagency Agreement (IAG).

Current cleanout schedules (included in Enclosure 2) indicate pilot testing is planned to begin mid-August. We are therefore seeking CDH review and approval of this change to interim status by August 15, 1992.

Additional details on the enclosed information can be provided on request. If you have any questions, please contact Debbie Mauer at 966-5598.

Enclosures:
As Stated

cc w/Enclosure:
M. Hestmark - EPA

cc w/o Enclosure:
G. Baughman - CDH
N. Matsuura - CDH
D. Maxwell - EPA
A. L. Schubert - EG&G Rocky Flats, Inc.
P. W. Edrich - EG&G Rocky Flats, Inc.